

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts D.T.E. 01-20

AT&T's FIRST SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.

Please provide answers as they are completed.

These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.

If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.

If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.

If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.

Unless otherwise stated, these requests concern Verizon's Massachusetts intrastate operations.

INFORMATION REQUESTS

1. For each year, 1990 through 2000, please provide the following data for Massachusetts pursuant to FCC books (provide both a total and specific data for each account and subaccount (e.g. - metallic and non-metallic)):

a) Beginning-of-year plant in service and depreciation reserve balance.

b) End-of-year plant in service and depreciation reserve balance.

c) Plant additions.

d) Plant retirements.

e) Depreciation accruals.

f) Transfers and adjustments.

2. Provide the same data requested in Request 1 pursuant to intrastate books, if different.

3. Provide Verizon's current planning forecasts for the data in Request 1 for the years 2001 forward.

4. Provide Verizon's current planning forecasts for the provision of cable television services in Massachusetts, and identify the technology to be used (i.e. - DSL, Fiber/Coax, Wireless).

5. Provide Verizon's current planning forecasts for the provision of DSL services in Massachusetts.

6. Provide a copy of the latest earnings or surveillance report filed by Verizon with the Massachusetts DTE.

7. Provide a list of projection lives and future net salvage percentages as currently prescribed for Verizon by the Massachusetts DTE. Also provide the relevant documentation that Verizon believes demonstrates that the DTE has prescribed those particular lives (i.e. - Commission Order, correspondence, etc.).

8. Provide Verizon's current planning forecasts for ATM switch deployment.

9. Specify whether Verizon's ATM deployment will be as an "overlay" network, or will replace digital switches.

10. If Verizon anticipates that the deployment of ATM switching will displace any of its existing switches, identify those switching locations which will be displaced and their anticipated replacement date.

11. Provide Verizon's current planning forecast for SONET deployment.

12. Provide Verizon's current planning forecast for fiber in the distribution network.
13. Provide actual deployment data for ATM, SONET and fiber in Verizon's current distribution network.
14. Provide copies of Verizon's 1990-2000 ARMIS 43-07 reports for Massachusetts.
15. Provide a copy of the latest "Average Life Indications Based on Full Mortality Study" for each account and subaccount.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand or mail on May 8, 2001.
